



Oregon Dungeness Crab Commission
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June 28, 2022

Mr. Doug Boren
Bureau of Ocean Energy Management
Office of Strategic Resources
760 Paseo Camarillo; Suite 102
Camarillo, California 93010

Submitted online to Docket No. BOEM-2022-0009 via <http://regulations.gov>

RE: Oregon Call Areas: Call for information and request for comments

Dear Mr. Boren:

We appreciate the opportunity to comment on the Coos Bay and Brookings call areas for the Oregon Dungeness Crab Commission, representing the interests of the over 420 permitted vessels that make up our commercial fishing fleet.

We would submit, however, that the decisions made regarding these call areas will be felt far beyond the fishermen and the families that make up our fishery. The socio-economic impact is likely to have a ripple effect felt by families throughout the state of Oregon. That impact will be felt by the families who rely on the economic impact that our fishery has on the state's economy (including the thousands of jobs associated with our fishery through the processing, shipping, sales industries, etc.), as well as the nutritious and sustainable product that Oregonians and others have come to rely on for generations.

We are continuing to strongly encourage BOEM to slow the process for there to be time to do an objective cost-benefit analysis, in addition to completing the needed scientific studies to answer the numerous questions that have been posed throughout the public comment period.

We are asking that any such cost-benefit analysis include the potential job losses to the fishing and seafood industries that are affected. From the beginning of this process, we have been opened to discussing ways to find a win-win solution. For BOEM to seriously seek that same outcome, we feel that a higher priority must be paid to ensuring that there will be existing and thriving communities around to benefit from any potential renewable energy being produced. Our communities, businesses and families of the present should not be considered merely expendable losses in the quest for wind.

As for the questions that remain unanswered, among the biggest to the Oregon Dungeness Crab Commission remains the impacts of the Electromagnetic Fields (EMF) from submarine power cables.

In one of the very studies that some BOEM members have cited on the matter (Love, et al., Assessing Potential Impacts of Energized Submarine Power Cables on Crab Harvests, 2017.), the discussion ends with a far from ringing endorsement. Nor does it seem to those conducting that study that the case is closed:

“We are at pains to acknowledge that this subject has not been exhausted and note that additional research is likely needed. Nevertheless, the results of our study are in line with the current understanding of these effects as summarized in Thomsen et al. (2015) and Copping et al. (2016). In particular, while acknowledging the potential for EMF to cause impacts on marine organisms and while recommending additional research, Copping et al. (2016) go on to state that “Based on the evidence to date there is no demonstrable impact (negative or positive) of EMF related to MRE [Marine Renewable Energy] devices on any sensitive marine species.”

While it appears that a new BOEM study is winding down, it is not set to be released [until October](#).

In the meantime, we have other studies that have come out indicating, for instance, that [Brown crab are being affected](#), and [Lobsters are showing changes due to EMF](#).

Given that, as [BOEM notes in the call](#), Dungeness crab and pink shrimp are the highest-value invertebrate species in Oregon – to the extent that: “Economic productivity of Oregon’s invertebrate fisheries reflects biological productivity and is higher on the continental shelf when compared to the continental slope. Substantial portions of the fishing grounds for Dungeness crab and pink shrimp, the two highest-value fisheries landed in Oregon ports, are avoided by the 13.8-mile exclusion buffer from shore.” Shouldn’t that consideration be extended to ensure the health of the species, now and for future generations?

We would also like to draw BOEM’s attention the vital dependence that Oregon’s fisheries place on what is known as the California Current Large Marine Ecosystem (CCLME) that runs along the West Coast. As noted in our Oregon Department of Fish & Wildlife [Dungeness Crab Management Plan](#) this ecosystem is extremely important to our fishery (pg 15):

“The system is characterized by a number of complex physical processes including seasonal wind-driven upwelling, variable local wind dynamics, and freshwater input from

estuaries and rivers (e.g., the Columbia River plume) (Hickey and Banas, 2008). Interannual variability in these processes is closely tied to habitat characteristics (e.g., temperature, productivity), which directly and indirectly impact Dungeness crab throughout their life cycle.”

With this in mind, we join others in the fishing industry in asking BOEM to further study the potential impacts that these wind farms would have on the California Current processes and how offshore wind would affect the ocean ecology.

For over a century, the Oregon seafood industry has been providing nutritious and sustainable protein to families in our state and around the world. As we have stated consistently from the beginning in meetings with BOEM, the risk is too great not to get this process done correctly. It is our opinion that too much has been rushed. We risk missing the forest for the trees. To answer one critical pressing challenge in climate change we seem on the edge of creating multiple other environmental and economic challenges in the near and distant future. Quite simply, ignoring the tough questions now in the name of expediency is antithetical to being able to find a win-win solution – or any real solution, at all.

We concur with the others who have noted that our fishermen, processors, coastal communities fully understand the importance of protecting this natural resource. Which is why we have turned out in number and in good faith to so many meetings. We are hopeful that those good-faith comments will be taken to heart and given all serious consideration, including:

- ✦ Pausing the leasing process until scientific studies are completed, in particular we ask for expedited studies done related to EMF cable effects and the potential impacts of OSW farms to the CCLME.
- ✦ Conduct a thorough Cost-Benefit Analysis with focus on the fishing and related industries, including how the loss of any industry to the coastal communities could impact any potential to pay for electricity rates going forward.
- ✦ Commit to doing a full programmatic environmental impact statement (PEIS).
- ✦ Rescind current call areas and issue a new call area outside of 1300 meters, consistent with the comments of fishermen throughout the meeting process.
- ✦ Establish transit lanes and retain existing towboat-crabber towlanes. The transit lanes would afford safer navigation to and from the ports for those vessels accessing deeper water fishing areas. Small fishing vessels, especially, would need access to lanes sufficiently wide enough to account for changes in weather patterns.

We also support the creating north/south towboat/crabber towlanes. [Washington Sea Grant, in its comments](#) in this docket, notes how the Coos Bay call area abruptly stops the outer towboat lanes (year-round lanes) used primarily by towboats during the winter, when crabbers are fishing inshore of that area during Dungeness crab season. Eliminating this towlane will force towboats shoreward of the call area and into popular Dungeness crab grounds, exacerbating conflicts between crab gear and marine shippers. Including a north/south outer towlane of sufficient size to maintain shipping and towboat safety during winter storms will continue to reduce conflicts with the crab fleet, reduce safety hazards and save millions of dollars to towboat operators and crabbers in lost gear and vessel repairs.

At minimum, BOEM should at least account for access lanes from the outer, year-round towlanes to the inner towlanes closer to shore.

While we appreciate the opportunity to provide input and suggestions relating to the Oregon call areas, nothing replaces actual dialogue. By that, we mean the give and take of information and data. In our opinion that has been woefully lacking throughout this process. However, it is the kind of thing that is absolutely vital to any kind of successful project. We have been told, repeatedly, that we are at the start of the process. If that is so, there is no reason not to push “pause” and have actual discussions with the people and the industries that will be most affected. We have no doubt it will, in the end, help to expedite the hunt for the solution to this challenging problem.

Too much is still unknown to simply “kick the can down the road” or into the water. Future generations will be left to answer for it if we don’t get it right the first time.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Hugh Link".

Hugh Link
Executive Director, ODCC